

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**KENO ROMARIO BROWN,**

**Defendant**

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**CASE NO. GJH-1968**

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**AFFIDAVIT OF COURTNEY MULHOLLAND**

I, Courtney Mulholland, being first duly sworn, depose and state as follows:

1. The following affidavit is intended to supplement the evidence introduced at trial of **Keno Romario Brown** (“**Brown**”), and explain the evidence showing that several additional coconspirators—including **Ashley Reid** (“**Reid**”), **Royden McAlmont** (“**McAlmont**”), **Witness 1**, **Witness 4**, and **Jamia Brooks** (“**Brooks**”)—were involved in the offense.

2. On January 2, 2019, I affirmed an affidavit in support of a complaint and warrant to arrest **Brown** in case number GLS-19-1. That affidavit is incorporated here by reference.

**Witness 1**

3. On March 23, 2018, homicide detectives from the Metropolitan Police Department (“MPD”) interviewed **Witness 1**. The focus of the interview was codefendant **Travis Ennis**’s murder.

4. During the interview, **Witness 1** told the detectives that **Ennis**, coconspirator **Onijah Crighton** (“**Crighton**”), **McAlmont**, and **Reid** participated in a scheme by which they fraudulently represented to victims over the phone that they had won prizes, and directed those victims to send money to collect those prizes, which were fictitious.

5. **Witness 1** admitted that she was romantically involved with and acted as a runner for **Ennis**—a lower level member of the conspiracy who received fraudulent proceeds on **Ennis**'s behalf.

6. Your affiant knows from witness interviews and Facebook records that **Reid** is friends with **Crighton**, and that **Reid** and **Crighton** attended the same high school.

7. On July 14, 2017, **Reid**, **Crighton**, and **Brown** were together in a vehicle and were arrested by officers from the Prince George's County Police Department following a traffic stop.

8. Western Union records show that between July 16, 2014 and May 4, 2016, **Reid** sent 19 wire transfers totaling \$16,245 to individuals in Jamaica listing 5810 36th Avenue Hyattsville, Maryland ("**Reid**'s address") on the outgoing wire transfer forms.

9. MoneyGram records show that between February 27, 2015 and January 12, 2017, **Reid** sent 20 wire transfers totaling \$16,045 to individuals in Jamaica, listing her address on the outgoing wire forms.

10. RushCard records show that on June 4, 2011, **Reid** submitted two debit card applications in her name using the email address reida17@hotmail.com and mailing address 5437 16th Avenue Apartment 203, Hyattsville, Maryland ("the 16th Avenue address"), which was **Reid**'s previous address. The applications were submitted from IP address 69.143.242.67 ("the 4267 IP address").

11. RushCard records show that on October 2, 2012, a debit card application in the name of **Reid** was submitted using email address reida17@hotmail.com and the 16th Avenue address as the mailing address. The application was submitted from IP address 69.143.243.33 ("the 4333 IP address"). On that same date, there was one login to **Reid**'s Facebook account from the 4333 IP address.

12. RushCard records show that on March 18 and April 24, 2013, four applications for debit card accounts were submitted using the email address reida17@hotmail.com from IP address 68.50.192.88 (“the 9288 IP address”).

13. The personal identifying information (“PII”) on the applications for those four debit cards show that the purported applicants were born between 1931 and 1982. Two of the applications—in the names of victims Kristen Taylor and Louise Robello—were submitted using the mailing address 7744 Normandy Road, Landover, Maryland (“the Normandy Road address”).

14. Facebook records show that on March 18, 2013, there was one login to **Reid’s** Facebook account from the 9288 IP address. Facebook records also show that between April 19 and April 27, 2013, there were three logins to **Ennis’s** Facebook account from the 9288 IP address.

15. AccountNow records show that on June 29, 2013, two applications for debit card accounts were submitted in the names of victims Daniel Lahmon and Derek Hattaway. The PII on the applications shows that purported applicants were born in 1952 and 1987, respectively. Both applications were submitted using the email address reida17@hotmail.com.

16. On August 14, 2013, Gredler spoke with **Ennis**, who identified himself as Tony Wilson. Wilson instructed Gredler to send \$3,000 through the U.S. Postal Service to “**Monique Reid**” at the Normandy Road address to cover advance fees for Gredler’s fictitious lottery prize.

17. On August 19, 2013, postal inspectors conducted surveillance at the Normandy Road address. Agents observed the postal employee attempt to deliver the Express Mail package containing the postal money number with the serial number ending in 6440 (“the money order”) in the amount of \$874 from Gredler to **Monique Reid**. The postal employee knocked on the door and an unidentified female answered. Agents observed that the postal employee did not hand the package over to the female, and the postal employee then left the residence with the package.

18. Postal service management later advised postal inspectors that the package was not delivered because the unidentified female who answered the door could not provide identification showing that she was **Monique Reid**. Therefore, the postal employee brought the Express Mail package back to the Landover Hills Post Office to be held for pick-up.

19. On August 21, 2013, postal service management informed postal inspectors that **Reid** entered the Landover Hill Post Office to pick up the Express Mail package containing the money order. **Reid** provided a copy of her Jamaican Passport and a copy of a Visa debit card in the name of “**Ashley Monique Reid**” as identification. **Reid** asked the postal clerk if she could cash the money order, but the postal clerk advised **Reid** that they did not have enough funds to cash it. **Reid** then went to the Landover Post Office to cash the money order.

20. On August 21, 2013, postal inspectors seized the cashed money order from the Landover Post Office and obtained video surveillance. A review of the video showed **Reid** cashing the money order. **Reid** arrived at the Landover Post Office with a black male who resembled **Ennis**. Postal employees advised postal inspectors that **Reid** and the male left the post office in a BMW bearing Maryland tag 9B2117 which was registered to Roxanne Burchell—**McAlmont**’s former girlfriend and **McAlmont**’s two children.

21. On April 12, 2018 and April 19, 2018, **Witness 4** proffered with the FBI, USPIS, MPD Homicide Branch, and United States Attorney’s Office for the District of Maryland. **Witness 4**—who had a close personal relationship with **Crighton**—told the government that **McAlmont**, **Brown**, and **Crighton** executed a lottery scheme, and that an individual named **Tarik Williams**, also known as “Parrie” (“**Williams**”), was the leader of the conspiracy. According to **Witness 4**, **Williams** gave **McAlmont**, **Brown**, and **Crighton** directions on how to execute the scheme and

where to send the money. Publically-accessible photographs on **Reid**'s Facebook account show **Reid** together with **Williams** and **Ennis**

22. **Witness 4** admitted to her own involvement in the scheme as a runner as recently as late 2017.

23. On April 26, 2018, agents interviewed victim Beverly Randall, who told the agents that in September 2017 she lost approximately \$40,000 as part of a lottery scheme. Randall told the agents that she sent the money to collect her prize via FedEx, UPS, Walmart MoneyGram, and Western Union. FedEx records show that Randall sent the money to **Reid**'s address on 14 separate occasions.

24. FedEx records also show that Randall sent money to **Witness 4** at the address where **Witness 4** was at the time residing.

25. On April 26, 2018, agents interviewed victim Oscar Roe, who told agents that he lost approximately \$50,000 as part of a lottery scheme. Roe recalled sending money through FedEx and UPS. Records from FedEx show that Roe sent at least one package to **Reid**'s address on August 17, 2017.

26. FedEx records show that in July 2017, victim John Moore—who is 85 years old and lives in Arizona—sent a package to **Reid**'s address. On April 27, 2018, agents interviewed Moore, who is 86 years old and lives in Arizona. Moore told agents that he lost approximately \$500 as part of a lottery scheme. Moore advised he sent one package containing cash as a result of the scheme. FedEx records show that Moore sent money to **Reid**'s address on July 15, 2017.

27. On April 27, 2018, agents interviewed victim Donald Clark, who is 86 years old and lives in Nevada. Clark told agents he lost approximately \$55,000 as part of a lottery scheme. Clark advised that he always sent his packages via FedEx. Clark stated that one of the packages

he sent contained \$8,000, but Clark could not remember the amounts he sent in the other packages. FedEx records show that Clark sent packages to **Reid**'s address on four occasions between February 10 and February 26, 2018.

28. On April 29, 2018, agents interviewed victim Lonnie Harris, who is 70 years old and lives in Texas. Harris told agents that he lost approximately \$8,000 as part of a lottery scheme. Harris advised he sent money in multiple packages to **Reid**'s address in order to pay taxes he believed he owed to the IRS for his prize winnings. Harris told agents that he mailed the money by hiding the cash in between the pages of a magazine. The individuals who defrauded Harris threatened Harris that he would be put in jail by the IRS or Homeland Security if he did not mail the money. FedEx records show that Harris sent packages to **Reid**'s address on six occasions between March 6 and April 9, 2018.

29. In April 2018, the FBI received records from FedEx showing that on March 3, 2018, victim Charlotte Twitchell—who is 70 years old and lives in California—sent a FedEx package to **Reid**'s address. On April 30, 2018, agents interviewed Twitchell, who told agents that she lost approximately \$180,000 as part of a lottery scheme. Twitchell told agents that the scheme started in September 2017, and that she sent the money to cover fees, taxes, and storage for her \$8.5 million prize.

30. Twitchell sent the money via Western Union, Wal-Mart money transfers, and FedEx. Twitchell advised that he took a loan out on his Individual Retirement Account (“IRA”) in order to pay the fees on his prize. Twitchell stated that the most money he ever sent at one time was \$30,000 in cash. FedEx records show that Twitchell sent money to **Reid**'s address on six separate occasions between September 2017 and April 2018.

**Jamia Brooks**

31. During a series of interviews, **Brooks** told agents that she was romantically involved with **Crighton**.

32. Emails recovered from **Crighton**'s Gmail account, hotskullz@gmail.com, showed that **Brooks** assisted with the execution of the lottery scheme. For instance, on November 27, 2013, **Brooks** emailed **Crighton** a fraudulent call script, which in part appeared as follows:

**From:** Ja'Mia Brooks <jamiabrooks26@yahoo.com>  
**Date:** 11/27/2013 07:07 PM  
**To:** "hotskullz@gmail.com" <hotskullz@gmail.com>

**Live-Transfer Lead Script**

Below we have outlined the telemarketing script our callers use qualify potential clients. With every application we gather, their information is screened against your request criteria before we can transfer their call directly into your office.

**INTRODUCTION:**

**CALL-AGENT:** "Hello may i speak with \* \_\_\_\_\_ \*

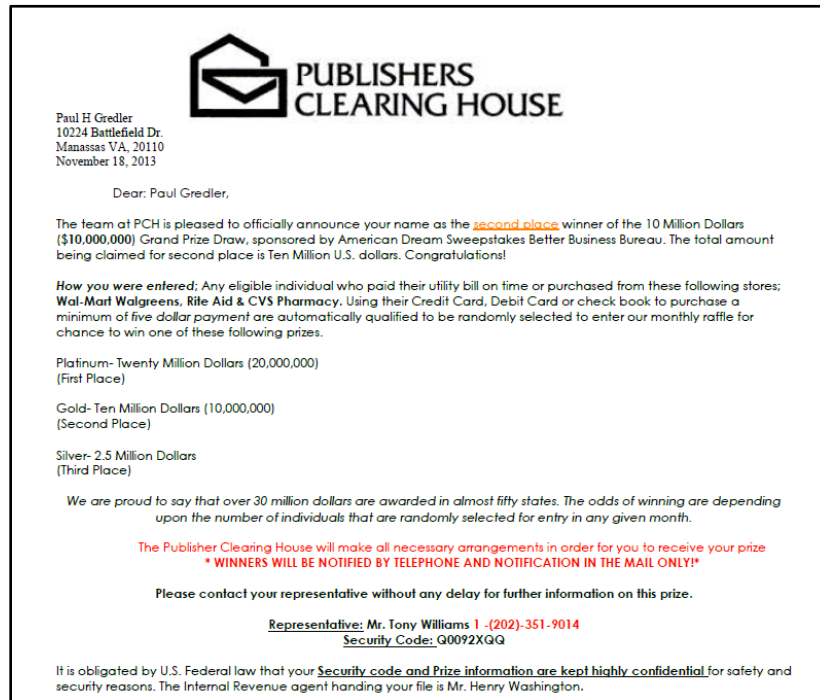
**BORROWER:** "Yes, speaking."

**CALL-AGENT :**"Hi , This is Mark Washington, I'm an assistant with The Publisher Clearing House, How are you today?

**BORROWER:** \* Answers\*

**CALL-AGENT:** I'm calling you today to inform you have recently when making a minimum purchase of a five dollar payment using your Credit Card, Debit Card at Wal-Mart, Walgreens, Rite Aid & CVS Pharmacy been selected in a drawing by the Publisher Clearing House for the second place prize of \$10,000,000. Congratulations!

33. Similarly, **Brooks** emailed **Crighton** the following letter that falsely advised Gredler that he won a prize from Publishers Clearing House.



34. Finally, records from money transfer services show that **Brooks** received electronic wire payments from elderly victims. For instance, records from MoneyGram show that on July 30, 2015, **Brooks** received a \$599 money transfer from victim John Parrett, who resided in Oregon. Approximately two weeks later, **Brooks** received a \$400 MoneyGram transfer from victim Jay Chandler of Stafford, Virginia.

35. Records from Western Union show that on May 20, 2015, **Brooks** received a \$400 money transfer from victim Maria Erb of Vail, Colorado.

36. On June 1, 2015, officers from the Vail Police Department interviewed Erb, who told the officers that the \$400 she wired to **Brooks** represented IRS taxes and other fees for a \$3 million prize she won. **Brooks** was thereafter charged with theft in Vail, pled guilty, and was given a diversionary sentence.



**Conclusion**

I affirm under the penalties of perjury that the foregoing is true and correct to the best of my knowledge.

A handwritten signature in dark ink, appearing to read "Courtney Mulholland", is written over a horizontal line.

Courtney Mulholland  
Postal Inspector  
United States Postal Inspection Service